

**LEWIS BRISBOIS BISGAARD & SMITH LLP**

ELLEN JEAN WINOGRAD

Nevada Bar No. 815

Ellen.Winograd@lewisbrisbois.com

**PHILIP J. TACASON**

Nevada Bar No. 15655

Philip.Tacason@lewisbrisbois.com

5555 Kietzke Lane, Suite 200

Reno, Nevada 89511

Telephone: 775.399.6383

Facsimile: 775.827.9256

Attorneys for Defendant JACK JUAN

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JACQUELINE NICHOLS, individually,

Plaintiff,

vs.

JACK JUAN, an individual; DOES I through  
X; ROE Corporations I through X, inclusive,

Defendants.

Case No. 2:25-cv-00120-GMN-NJK

**STIPULATION AND PROPOSED ORDER  
TO EXTEND TIME TO RESPOND TO  
PLAINTIFF JACQUELINE NICHOLS'S  
FIRST AMENDED COMPLAINT (FIRST  
REQUEST)**

Plaintiff JACQUELINE NICHOLS, by and through her attorneys of record, Margaret A. McLetchie and Leo S. Wolpert of McLETCHIE LAW, and Defendant JACK JUAN, by and through his attorneys of record, Ellen J. Winograd and Philip J. Tacason of LEWIS BRISBOIS BISGAARD & SMITH LLP (collectively "the Parties"), submit the following STIPULATION AND PROPOSED ORDER TO EXTEND TIME TO RESPOND TO PLAINTIFF JACQUELINE NICHOLS'S FIRST AMENDED COMPLAINT (FIRST REQUEST). The Parties stipulate to extend the time within which Defendant may respond to Plaintiff's First Amended Complaint by 21 days.

The parties seek this extension of time because Defendant's lead counsel had a series of medical incidents, beginning February 19, 2025. Counsel was travelling out-of-state. See LR IA 6-1(a) (providing that a request to extend time "must state the reasons for the extension requested."). Should the Court require further information on Defendant's counsel's medical condition, counsel will submit additional information and documentation to the Court *in camera*.

Plaintiff requires further time to respond to any motion to dismiss because lead counsel for Plaintiff has an evidentiary hearing March 24-March 28, 2025, and will be preparing for the same March 17-March 23, 2-25. Further, lead counsel for Plaintiff has oral argument at the Nevada Supreme Court April 8, 2025.

**A. Proposed deadline to respond to First Amended Complaint.**

Event	Current	Proposed New Deadline
Deadline to Respond to First Amended Complaint	March 11, 2025	March 18, 2025
Deadline to Reply to Motion to Dismiss Amended Complaint		<p><i>If the Court grants the extension as to Defendant Juan's deadline, LR 7-2 provides 14 days within which to respond to a motion. Thus, if Defendant were to file a Rule 12 motion on March 18, Plaintiff's response would be due on April 1, 2025.</i></p> <p><i>The Parties stipulate that the deadline for Plaintiff's Response will be moved to April 15, 2025<sup>1</sup></i></p>

IT IS SO STIPULATED.

MCLETCHIE LAW

DATED this 10th, March, 2025.

By: /s/ Margaret A. McLetchie

Margaret A. McLetchie, Esq.

Leo S. Wolpert, Esq.

MCLETCHIE LAW

602 South Tenth Street

Las Vegas, Nevada 89101

*Attorneys for Plaintiff JACQUELINE NICHOLS*

LEWIS BRISBOIS BISGAARD & SMITH LLP

DATED this 10th, March, 2025.

By: /s/ Ellen Jean Winograd

Ellen Jean Winograd, Esq.

Philip J. Tacason, Esq.

LEWIS BRISBOIS BISGAARD & SMITH LLP

5555 Kietzke Lane, Suite 200

Reno, Nevada 89511

*Attorneys for Defendant JACK JUAN*

**ORDER**

**IT IS SO ORDERED.**

  
United States Magistrate Judge

Dated: March 11, 2025

<sup>1</sup> Plaintiff's position is that any motion to dismiss practice should be stayed until after the Court resolves Plaintiff's Motion to Remand (ECF No. 7) in no small part to save on attorney's fees and costs.